

2. in the perpetration of child abuse, that being knowingly and intentionally causing death and serious bodily injury to a child.

All in violation of Title 18, United States Code, Section 1111.

NOTICE OF SPECIAL SENTENCING FACTORS

Sentencing Factor #1:

On and after September 9, 2016, the defendant

SETH WILLIS PICKERING

was age 18 or older. 18 U.S.C. § 3591(a).

Sentencing Factor #2:

On or about September 9, 2016, the defendant

SETH WILLIS PICKERING

- a) intentionally killed Lila Pickering (18 U.S.C. § 3591(a)(2)(A));
- b) intentionally inflicted serious bodily injury that resulted in the death of Lila Pickering (18 U.S.C. § 3591(a)(2)(B));
- c) intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Lila Pickering died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C)); and,
- d) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants of the offense, such that participation in the act constituted a reckless disregard for human life, and Lila Pickering died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D)).

Sentencing Factor #3:

On or about September 9, 2016, the victim, Lila Pickering, was particularly vulnerable due to her youth. 18 U.S.C. § 3592(c)(11).

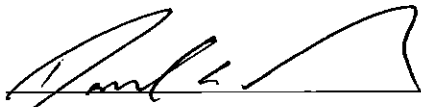
A TRUE BILL

GRAND JURY FOREMAN

JILL WESTMORELAND ROSE
UNITED STATES ATTORNEY



DON GAST
ASSISTANT UNITED STATES ATTORNEY



DAVID THORNELOE
ASSISTANT UNITED STATES ATTORNEY